

Bell Atlantic

185 Franklin Street, Room 1403, Boston, MA 02110
Tel (617) 743-2445
Fax (617) 737-0648

Bruce P. Beausejour

General Counsel - Massachusetts

June 7, 2000

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
Commonwealth of Massachusetts
One South Station
Boston, Massachusetts 02110

Re: Bell Atlantic-Massachusetts, D.T.E. 99-271

Dear Ms. Cottrell:

The Department should deny AT&T's request to reconsider its Order of May 12, 2000, which denied an AT&T motion seeking a modification to the KPMG Master Test Plan to include volume testing of the Local Service Ordering Guidelines Release 4 ("LSOG 4"). AT&T has failed to show that the Department's Order was the result of mistake or inadvertence. Indeed, its claim is based on little more than AT&T's own misstatement of the record in the case and the basis for the Department's ruling.

AT&T argues that the Department rejected LSOG 4 volume testing because BA-MA represented that LSOG 2/3 and LSOG 4 *share the same front-end systems*, and therefore, that volume testing results for LSOG 2/3 are applicable to LSOG 4. AT&T maintains that this is a "key mistake of fact" which requires reconsideration. AT&T Reconsideration at 1. AT&T is wrong.

The Bell Atlantic "front-end systems" are the applications with which the CLECs communicate in placing their preorder or order transactions. These are EDI, Web GUI, and CORBA. LSOG 2/3 and LSOG 4 *do* share these front-end systems, and volume testing results for LSOG 2/3 are applicable to LSOG 4. There is no factual error in the Department's ruling.

What AT&T apparently *meant* to allege is that the move from LSOG 2/3 to LSOG 4 would include changes in other applications that are commonly referred to as "middleware" or "gateway" applications. Some of the applications within this group of systems are DCAS, Request Manager, and CSR Parser. These are the systems Mr. Miller testified to at the Technical

Session on November 22, 1999, which AT&T references in its request for reconsideration.¹ In its May 12th Order, the Department expressly noted that there would be changes in these systems, including the introduction of a new application, Request Manager. In fact, the Department directed KPMG to perform a comprehensive feature function test of LSOG 4, and specifically the editing processes performed by the new Request Manager application. Thus, far from being mistaken as to the facts as AT&T alleges, the Department properly distinguished between BA-MA's front-end systems and other systems and has ensured that KPMG's testing is appropriate for each type.

Moreover, AT&T ignores that the Department's May 12th Order was also based on the fact that KPMG will be testing BA-MA's Change Management process for introducing new software. As the Department has previously ruled, "software change is inevitable and iterative and will remain so. How a BOC responds to this inescapable fact is ultimately more important than the characteristics of any particular OSS software version." *See* Department Letter Order, at 3 (November 19, 1999). The Department has directed that KPMG conduct more extended testing of BA-MA's Change Management process (*id.*, at 3-4) and has thereby taken the appropriate steps to address the introduction of new software.

In what is becoming a recurring theme for AT&T, it once again raises the issue of missing notifiers that occurred in New York as evidence of a need for additional testing of BA-MA's OSS. The claim is without merit, and as in other comments, AT&T greatly exaggerates the extent of the New York problem, and its significance here. Although Bell Atlantic observed delays on a significant number of these notifiers, most of the underlying orders proceeded through the provisioning and billing completion steps in a timely manner. In fewer than 3% of the cases, Bell Atlantic had no record of receiving the order, and asked the CLEC to resubmit the order. In addition, Bell Atlantic determined that the primary cause of the missing notifiers was a software component of the EDI order processing system, *i.e.*, the front-end system, which was supplied by a third-party vendor. KPMG's volume testing in Massachusetts, which is on top of the substantial production volumes Bell Atlantic's systems are handling each day, will identify any comparable problems. Finally, and most importantly, once the problem was identified, Bell Atlantic had teams of information technology and systems employees work around the clock for several weeks to identify the source of the problem - and then fix it. AT&T is rehashing old news.

¹ AT&T mischaracterizes Mr. Miller's testimony by stating that he explained that DCAS was a Bell Atlantic-North front-end system. Mr. Miller did not refer to DCAS in this manner but distinguished the front-end EDI and CORBA systems from other systems, such as the DCS gateway and the DOE back-end system. Tr. 11/22/99 at 2053-54.

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In sum, the Department's May 12th Order was correct on the facts and considered all relevant factors in rejecting AT&T's request for LSOG 4 volume testing. The Department should reject AT&T's effort to reverse that decision.

Sincerely,

Bruce P. Beausejour

cc: Chairman James Connelly, Esq.
Commissioner W. Robert Keating
Commissioner, Deirdre K. Manning
Commissioner Eugene J. Sullivan, Jr.
Commissioner Paul Vasington
Hearing Officer Cathy Carpino
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